

FRANCIS O. SCARPULLA (41059)
 CRAIG C. CORBITT (83251)
 MATTHEW R. SCHULTZ (220641)
 QIANWEI FU (242669)
 ZELLE HOFMANN VOELBEL MASON & GETTE, LLP
 44 Montgomery Street, Suite 3400
 San Francisco, CA 94104
 Telephone: 415-639-0700
 Facsimile: 415-693-0770
 ccorbitt@zelle.com

JOSEPH M. ALIOTO (42680)
 THERESA D. MOORE (99978)
 ANGELINA ALIOTO-GRACE (206899)
 JOSEPH M. ALIOTO, JR. (215554)
 ALIOTO LAW FIRM
 555 California Street, 31st Floor
 San Francisco, CA 94104
 Telephone: 415-434-8900
 Facsimile: 415-434-9200
 jaliotojr@aliotolaw.com

JACK W. LEE, Esq. [SBN 71626]
 BRAD YAMAUCHI, Esq. [SBN 73245]
 B. MARK FONG, Esq. [SBN 99672]
 HUGO A. ZIA, Esq. [SBN 122599]
 MINAMI TAMAKI LLP
 360 Post Street, 8th Floor
 San Francisco, California 94108-4903
 Telephone: (415) 788-9000
 Facsimile: (415) 398-3887
 jlee@MinamiTamaki.com

Interim Co-Lead and Liaison Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

IN RE TFT-LCD (FLAT PANEL)
 ANTITRUST LITIGATION

Case No. C-06-07588 SI

Master File No. C07-1827 SI

This Document Relates to:

MDL No. 1827

CANDACE ROWLETTE, a Florida resident;

REQUEST FOR INTERNATIONAL
 JUDICIAL ASSISTANCE

and MICHAEL FRANCIS AYERS, a
Massachusetts resident, on behalf of themselves
and all others similarly situated,

(LETTER ROGATORY)

Plaintiffs,

v.

LG PHILIPS LCD CO., LTD.; LG PHILIPS
LCD AMERICA, INC.; LG ELECTRONICS
IND.; SAMSUNG ELECTRONICS CO.,
LTD.; NEC CORPORATION; NEC
ELECTRONICS AMERICA, INC.; NEC LCD
TECHNOLOGIES LTD.; HITACHI LTD.;
HITACHI DISPLAYS, LTD.; HITACHI
ELECTRONICS DEVICES (USA), INC.;
HITACHI AMERICA LTD.; IDT
INTERNATIONAL LTD.; CMO JAPAN CO.,
LTD; INTERNATIONAL DISPLAY
TECHNOLOGY USA INC.; IPS ALPHA
TECHNOLOGY, LTD.; ROYAL PHILIPS
ELECTRONICS NV; SANYO EPSON
IMAGING DEVICES CORPORATION;
SANYO ELECTRIC COL, LTD.; SEIKO
EPSON CORPORATION; SHARP
CORPORATION; SHARP ELECTRONICS
CORPORATION; SONY CORPORATION;
TOSHIBA CORPORATION; TOSHIBA
MATSUSHITA DISPLAY TECHNOLOGY
CO. LTD.; MITSUBISHI ELECTRIC
CORPORATION; AU OPTRONICS CORP.;
AU OPTRONICS CORPORATION
AMERICA; CHI MEI OPTOELECTRONICS
CORPORATION; CHI MEI
OPTOELECTRONICS USA, INC.;
CHUNGHWA PICTURE TUBES, LTD.;
HANNSTAR DISPLAY CORPORATION,

Defendants.

The United States District Court Northern District of California presents its compliments to
the Appropriate Judicial Authority of Taiwan, and requests international assistance to effect
service of process to be used in a civil proceeding before this Court in the above captioned matter.

1 **I. REQUEST**

2 This Court requests the assistance described herein as necessary in the interests of justice.
 3 The assistance requested is that the Appropriate Judicial Authority of Taiwan effect Service of
 4 Process of: Amended Summons in a Civil Case; Amended Class Action Complaint; Pretrial Order
 5 No. 5: Case Management; Judge Illston's Standing Order; Standing Order Re: Cases Designated
 6 for Electronic Filing; Case Management Conference Order; *Dispute Resolution Procedures in the*
 7 *Northern District of California* handbook; Notice Of Availability Of Magistrate Judge To Exercise
 8 Jurisdiction; the United States District Court for the Northern District of California's ECF
 9 Registration Information Handout; and Certified Translations of these documents on the below-
 10 named corporation:

11 AU Optronics Corporation

12 No. 1, Li-Hsin Rd. 2, Hsinchu Science Park

13 Hsinchu 30078, Taiwan;

14 The Appropriate Judicial Authority of Taiwan is requested to serve the documents listed
 15 above by personal service into the hands of a director, managing agent or other person authorized
 16 to accept service at the above listed address or in any manner prescribed for the service of such
 17 documents consistent with the law of Taiwan.

18 **II. FACTS OF THE CASE**

19 The Complaint in this action was been filed under Section 16 of the Clayton Act, (15
 20 U.S.C. § 26), to obtain injunctive relief for violations of Section 1 of the Sherman Act, (15 U.S.C.
 21 § 1), and to recover damages and/or restitution under various state antitrust and consumer
 22 protection laws, including to recover the costs of suit, and reasonable attorneys' fees. This Court
 23 has jurisdiction over the federal claims under 28 U.S.C. §§ 1331 and 1337. The Court has
 24 jurisdiction over the state law claims under 28 U.S.C. § 1367.

25 There are two general categories of cases in these related actions: (1) those brought under
 26 federal law on behalf of direct purchasers; and (2) those brought generally under state law on
 27 behalf of indirect purchasers, for which there are over seventy complaints covering twenty-three

different states. All plaintiffs allege that they purchased Thin Film Transistor Liquid Crystal Display products (“TFT-LCD Products”) either directly or indirectly from defendants or from their alleged co-conspirators. Plaintiffs claim damages caused by the defendants’ conspiracy to fix prices on TFT-LCD Products sold in the United States and elsewhere. The plaintiffs allege the conspiracy began in November 1, 1998 and continued through at least December 31, 2006 (the “Class Period”).

In or about December of 2006, the Antitrust Division of the United States Department of Justice (“DOJ”) sent out subpoenas to various companies in connection with an investigation of cartel activity in the TFT-LCD industry. Several of these companies being investigated have already pled guilty to price-fixing in the DRAM industry and have paid substantial fines to the DOJ for those unlawful activities.

III. RECIPROCITY

The United States District Court for the Northern District of California would be willing to provide similar assistance to the Appropriate Judicial Authority of Taiwan.

IV. REIMBURSEMENT FOR COSTS

Lead and Liaison Counsel for the Indirect-Purchaser Plaintiffs have represented that they are willing to reimburse the appropriate Judicial Authority of Taiwan for costs incurred in executing this Letter Rogatory in an amount not to exceed One Thousand Five Hundred dollars (\$1500.00). If the costs for executing this Letter Rogatory will exceed US \$1500, please contact Lead and Liaison Counsel for the Indirect-Purchaser Plaintiffs before exceeding this amount. Their contact information is as follows:

Francis O. Scarpulla
Zelle Hofmann Voebel Mason & Gette LLP
44 Montgomery Street, Suite 3400
San Francisco, CA 94104.
Phone: (415) 693-0700; Fax: (415) 693-0770.

Jack W. Lee
Minami Tamaki LLP
360 Post Street, 8th Fl.

San Francisco, CA 94108
Phone: (415) 788-9000; Fax: (415) 398-3887

In acknowledgment of the additional time which is needed to prepare and file a responsive pleading to the attached documents, the time period is extended to 45 days after service.

The Court extends to the Appropriate Judicial Authorities of Taiwan assurances of its highest consideration.

DATED: 10/23/07

By:



Hon. Susan Illston
United States District Judge
450 Golden Gate Ave, San Francisco, CA 94102
(415) 522-2028 (Tracy Sutton, Calendar Clerk)
(415) 22-2068 (Yumiko Saito, Docket Clerk)

#3170435v1